



Three Points-Liebre Mountain Town Council
P. O. Box 76
Lake Hughes, CA 93532
3pointsliebremountain@gmail.com

4 November 2015

SENT VIA EMAIL

Los Angeles County Regional Planning
Mr. Samuel Dea
Special Projects Section
320 West Temple Street
Los Angeles, CA 90012
213.974.4876
specialprojects@planning.lacounty.gov

Dear Mr. Dea,

RE: Specific Plan, Centennial Project No. 02-0232

Our town council appreciates the opportunity to participate in the Notice of Preparation (NOP) comment period for the Centennial Project (Project). We requested Special Projects Section provide the Initial Study Checklist (Checklist) and were unable to attain the document to assist us in the compilation of our letter. The Checklist would be helpful in understanding what Regional Planning believes to be the level of impact of various components of the Project and guide us in adequately addressing what impacts are potentially significant, significant, or less than significant with mitigation. Neither the NOP 2004, nor the NOP 2015 establishes the impact thresholds at which each item is determined to require mitigation, only that the Environmental Impact Review will evaluate and determine substantial adverse effects on Aesthetics, Agricultural Resources, Air Quality, Biological Resources, etc. The Check List usually determines impacts that are then addressed in the Environmental Impact Review (EIR) along with mitigation strategies. These NOP documents are primarily "Project Descriptions," in which we are told the EIR will determine if there is "substantial adverse effect," and whose items are merely read off the list, but not evaluated. This requires that we must question the ability of ourselves and others to "divine" impacts, and determine on our own what needs review and what level of review. We would also ask if an earlier analysis will be used for this plan and, request, if affirmative, that you publish the earlier reviews and documents on the Project webpages.

We have done our best to itemize our requests for what we believe should be considered in the EIR; please see the list below:

Aesthetics

- Expansive views in the project area will be change to one highly developed, including industrial zones, where nothing but open space currently exists. The area is situated among some of the best wildflower viewing in California, and is a "California Floristic Province" of great importance and

continuing loss. Explain how the project will preserve viewshed. Consider preservation, two acres replaced to one acre lost.

- Determine cumulative impacts to viewshed in surrounding areas as well, since development will undoubtedly result in continuing “sprawl” encouraged by this specific plan.
- Explain effects to night sky views, and consider lighting similar to that of areas interested in preserving darkness near observatories. Downward shielding of lighting as required by the County's Rural Lighting Ordinance—streetlights as well as commercial, private, interior and exterior lighting will not be adequate in reducing or preventing night sky glow, and will permanently affect the dark nights we enjoy now.
- Ridge Route Road and portions of Highway 138, and Gorman Post Road are listed as county scenic highways. Explain how the project will preserve viewshed from these areas.

AGRICULTURE

- Conversion of farmland to non-agricultural use will affect the historic use of the Tejon Ranch, affecting the cultural significance of the project area. How will the loss of grasslands and grazing affect supplies of locally grown livestock? While grazing has changed most lands in the California Floristic Province, preservation of grazing and grasslands and associated habitats have been able to maintain some beneficial qualities that would otherwise disappear with heavy commercial agriculture and urban/commercial/suburban housing development.
- Review effects of specially designated farmland loss. Consider preservation of valuable agricultural land and the opportunity to truly make the Centennial Project self-sustaining in food production.

FOREST

- Detail the effects of the project on the Angeles and Los Padres National Forests. Without doubt, the increase in visitors to an already overworked and underfunded forest system that will be stretched to the limits.
- Tell us how the project will protect forests from overuse and illegal uses—including marijuana grows and all that entails, unauthorized off-road use, increased threat of fire on local communities, all wildlife, endangered, special status, protected by law, or otherwise. The Angeles Forest Land Management Plan admits that 90% of fires are human caused. Increased population and forest use will place nearby communities at risk.
- The forests provide watershed protection; how would fires affect the ability for those watersheds to recharge local water supplies and the aquifer beyond?
- Will the project require additional powerlines to traverse the forests? Studies have shown the largest fires in California have occurred as a result of high wind events and/or downed powerlines.
- Possible loss of vegetation combined with heavy rain produces mudflows, flash flooding, debris flows and the like, with power to destroy properties adjacent to the project.
- Describe mitigations that would protect forests, their habitats and species, springs, streams, and aquifers, as well as private properties from the very adverse results of fire and overuse from a potential population of 80,000 or more.

AIR QUALITY

- Despite the county line dividing Kern and Los Angeles Counties' air quality districts, pollutants do cross jurisdictional lines. The National Cement Plant already emits serious pollutants into the air,

along with auto and industrial pollutants from the adjacent Interstate 5, and coastal and urban areas, which are usually distributed eastward into the the Mojave Air Basin by prevailing westerly winds. The Antelope Valley is already in non-compliance with the Environmental Protection Agency (EPA) and local air quality standards for particulates.

- We request that further investigation into whether the project will require review by the EPA and whether it will comply with both national and local air quality standards through out the building process.
- Best Management Practices (BMP) for particulates and dust control have proven ineffective at preventing deposition of fugitive dust into the air from past BMP “approved” projects. This is a crucial issue, from the first phases of the project to the last, since Valley Fever is a matter of public health importance. Not only that, but particulates will affect sensitive receptors with ailments like asthma, pulmonary and cardiac disorders. Require multiple samples for soil testing for cocci diodes *immitus*, with disclosure to residents of the project, and to the public. New Residents and those of surrounding communities need to know the risk of living in endemic areas like the Antelope Valley, and that construction is correlated with increased risk of infection. It is known that the spores of the cocci fungus can travel on the wind for up to seventy-five miles.
- There is no project control regarding the sale, lease, or rental of industrial space planned for the south side of Highway 138, that may produce objectionable odors or exhaust pollutants from manufacturing. Residents of our rural area expect an absence of unnatural odors from the results of the project.
- Evaluate increases in all potential dangerous air pollutants on persons, water, and all biological resources.
- Prohibit the sale/lease/rental to businesses that will produce objectionable odors or other pollution that will drift to adjoining properties as well as SEAs adjacent to the project industrial/manufacturing areas.

BIOLOGICAL RESOURCES

Tejon Ranch and the California Floristic Province

- As one of only five areas with a Mediterranean-type climate in the world--all of which are on the hotspot list--the California Floristic Province is characterized by hot, dry summers and cool, wet winters. The region contains a wide variety of ecosystems, including sagebrush steppe, prickly pear shrubland, coastal sage scrub, chaparral, juniper-pine woodland, upper montane-subalpine forest, alpine forest, riparian forest, cypress forests, mixed evergreen forests, Douglas fir forests, sequoia forests, redwood forests, coastal dunes, and salt marshes. Today, only about 80,000 square kilometers or 24.7 percent of the original vegetation, remains in more or less pristine condition. The California Floristic Province is a zone of Mediterranean-type climate and has the high levels of plant endemism characteristic of these regions. The hotspot is home to the giant sequoia, the planet's largest living organism and its taller but less massive relative, the coastal redwood. This region also holds a number of threatened endemic species--like the last individuals of the Critically Endangered California condor which can still be found here on the Tejon Ranch. In fact, the province is the largest avian breeding ground in the United States. Wilderness destruction caused by commercial farming is a major threat for the region as the California Floristic Province generates half of all the agricultural products used by U.S. consumers. The hotspot is also heavily threatened by the expansion of urban areas, pollution, and road construction. The issues that are causing the most threats to this province include but are not limited to population pressures, loss of habitat, unsustainable resource use, and introduced non-native species.

- Please explain the lasting effects of urbanization and sprawl development on the Province. Explain also how the project will preserve and improve this area of critical importance in Southern California. Conservation lands set aside should number twice the amount of project development, so as to preserve qualities of the Province—and experience no net loss.
- Explore rangeland conservation in the Province and its links to biodiversity conservation, as well as links to continuation of private ranching landscapes sustainably managed through resource conservation practices before stating the Tejon Ranch-Centennial development area is “degraded farmland” and valued only for development.
- Determine the loss of annual and native grasslands to invasive species that will undoubtedly introduce non-native plants to conservation areas and adjoining Significant Ecological Areas (SEA), and devise a plan to organize and fund the resources necessary for the eradication of non-natives and protection of those natural areas, on and off-site.
- How will loss of project grasslands affect future populations of perennial and annual grasslands?
- Explain the effects of invasive plant species on surrounding preserved grassland and forest areas.
- Require ongoing support and maintenance through non-chemical control of invasive plant species; require a native plant palette for all areas requiring landscaping, and control of invasive species in conservation areas.
- Detail overall effects to federal and state listed special status species including California Condors and their critical habitat area, Tri-colored blackbirds and their breeding and foraging sites at and around Quail Lake and Holiday Lake. Evaluate historic and current Condor movements in the project area and surrounding areas as well.
- How will avian life be protected according to the migratory bird treaty act and the Bald and Golden Eagle Protection Act? What about the loss of grassland for raptor foraging habitat? What are the projected declines in raptor populations?
- Describe how much breeding bird habitat will be displaced or destroyed by the project.
- Provide discussion on the effects to the Audubon designated Globally Important Bird Area encompassing the project. How will the project affect populations of migratory passerines, raptors, and waterfowl? What reductions in numbers can be predicted?
- How will the project preserve wildflower viewing areas?
- Evaluate the “urban heat island effect” on the average temperatures before, during, and after buildout, and their effects on wildlife. Determine the need for transitional habitat as global and local (project) temperatures increase and does the project include that as a conservation goal?
- How will the EIR adjust for changes to the environment over the last twelve years?
- This area is a well known convergence of the San Gabriel, Transverse, and Tehachapi Ranges and is described as an important wildlife corridor. The project appears to bisect the San Andreas SEA. How will building in this “Economic Opportunity Area” (EOA) inserted into planning documents, overriding the recommended expansion of this SEA, preserve and improve the corridor?
- Mitigation might suggest the building of animal crossings, if it is proved an adequate alternative to just letting wildlife cross highways and roads wherever they can.
- Please include in the EIR, all historical, archived recommendations made by the Significant Ecological Area Technical Advisory Committee to the project, and address each item and how the project will assure the continued health and improvement of the conserved SEA areas.
- Explain the effects of the project to United States Geological Survey's identification of part of the project area as an “Evolutionary Biological Hotspot and how the project will protect this important designated area.

- Describe how conservation lands will be protected from habitat loss associated with climate change and require continuing evaluation of conservation lands to assure they meet conservation goals, understanding the role of such lands as providing a safe haven for species whose distributions are projected to shift within reserves due to climate change and decline beyond those borders from land use changes. Use predictive mapping methods to determine effects of the project (creating its own warming) on surrounding forests and SEA areas near the project.
- Explain why water and wastewater treatment facilities must be placed in SEAs. None of the maps provided show the locations of such infrastructure.
- Describe the effects of recycled water use on native vegetation.
- List effects of urban run-off on preserved open-space drainages, wetlands, riparian areas, and properties nearby.
- Identify effects of residual pharmaceuticals in treated wastewater on drainages, wetlands, riparian areas, and properties nearby.
- Identify location and number of oak trees protected by the county's Oak Tree Ordinance and explain why they must be removed. Plan development to avoid destruction of oak trees and eliminate injury to disappearing California oak woodland.
- Detail increased use of Quail Lake on migratory waterfowl, raptors, and passerines who rely on the lake as a stop-over point or winter home.
- Explain effects of development to the Pacific Flyway—through the presence of people, destruction of habitat, water sources, etc.

CULTURAL RESOURCES

- Detail protection of important Native American Historical or archeologically important sites on project and in areas nearby. Preserve and protect these areas from development that will prevent access for study or Native American ceremonial activities.
- Ridge Route Road enjoys a listing on the National Register of Historic Places, as well as listing as a Los Angeles County Historic Place. Will increased population pressures cause illegal use or change the alignment from Highway 138 where Ridge Route Road begins its southern path?

GEOLOGY AND SOILS

- Explain how the project will protect residents from earthquake along the San Andreas and Garlock faults that essentially surround the project area to the south and west. The Antelope Valley Area Plan (AVAP) asserts that these zones would limit land use density in hazard areas exemplified by the project area, which appears to conflict with the high density designations in the “West Economic Opportunity Area.” Common sense would dictate lower density development than what is offered in the AVAP.
- Soil erosion as a result of creating impervious surface run-off—how does the project plan to protect soils and erosion?
- Provide a complete soils analysis, including the ability of soils to accommodate waste water treatment. Explain how waste water and sewage will be accommodated in the early phases of development when one assumes there will be no sewage treatment plant. Indicate the population density at which sewage treatment will be built. How will septic systems accommodate waste from industrial and commercial uses, and how will this affect local surface and groundwater, i.e., local sensitive wetlands, seeps, springs, drainages, and other riparian areas until such time a treatment plant is built?

GREENHOUSE GAS EMISSIONS

- How will the project decrease greenhouse gas emissions (GHG) in general, and explain specifically. The grasslands that exist in the project area now represent a huge carbon sink. Please describe the loss of this carbon sink in relation to creating more GHG throughout the construction process and through the additional traffic generated by truck deliveries and residents' automobile usage.
- There are no regional public transportation systems or services in place, and the transportation plans appear to address only internal transportation to and from the planned industrial areas. There is no guarantee of project residents actually working in the area; this is evidenced by other master-planned communities like Santa Clarita, suburban cities like Palmdale/Lancaster and their large commuter populations. At what population point is regional transportation planning incurred? The project could possibly see build-out and never be required to contribute to regional transportation.
- The expansion of the Northwestern Highway 138 has been justified by the project, yet we do not know how much GHG will be contributed by “commuter” driven development, and how much more will be produced by increased traffic in the area and by those passing through.

HAZARDS AND HAZARDOUS MATERIALS

- Determine the potential for industrial and municipal waste transport to and from the project area to release hazardous materials in proximity to the proposed expanded Highway 138, exacerbated by increasing truck transport encouraged by said highway expansion. How will hazardous waste be transported, disposed of, and how will enforcement of proper disposal be addressed? It is not unusual for trucks to dump hazardous loads in rural areas of the Antelope Valley; the project may increase the probability.
- Hazardous materials are involved in water treatment, solid waste, storm water run-off, use of industrial/manufacturing materials, electrical generation, and hazardous materials storage.
- How does the plan propose to protect surrounding communities from hazards incurred from development in special hazard class (fire, earthquake, flood) and special management areas, and how does this comport with the rural preservation strategy indicating low density development in hazard areas?

HYDROLOGY

- There is the potential for the project to substantially deplete groundwater supplies, not only on the project area, but surrounding private properties. Discuss contingency plans for the possibility of at least a ten year drought in the Antelope Valley, much like the period of 1894 to 1904, which devastated businesses in the area. The current drought has brought required cuts in usage of 35%. How can the project be justified in supplying approximately 80,000 people, plus industrial/manufacturing uses? Indicate build-out pumped water usage, and guarantee water supply in perpetuity, especially to property owners whose wells may become useless when providing water to a large population in times of drought. Rural communities are often used for their resources in supporting larger populations.
- Despite storm water drainage plans, increases in impermeable surfaces will cause huge effects to natural drainages and stream flows. How do you prevent off-site flooding and polluted run-off?

- We have seen recent news reports of substantial flash floods, mud and debris flows in mountain communities and areas of the Antelope Valley, that historically do not see flooding. Fire denuded hillsides during the Powerhouse Fire, causing life-threatening floods, destruction to private properties and businesses. What is the plan for preventing and reducing destruction from fire and subsequent weather events?
- Explain the source of water for the two golf courses planned. If it is treated water, explore the effects to natural areas nearby from the use of fertilizers, herbicides, rodenticides, and other chemicals that can cause harm to water sources, wildlife, and humans.

LAND USE AND PLANNING

- Please explain the conflict between the county's rural preservation strategy and its designation of high densities in the West EOA, as well as usually recommended reduced densities in special management areas, high fire hazard areas, flood zones and earthquake zones.

NOISE

- Describe how the project proposes disclosure to its developers and subsequent tenants regarding the explosive blasting performed at the National Cement mining areas. This is known to disturb existing residents nearby and has cracked window glass.
- Besides blasting, permanent increases in ambient noise levels starting with construction and continuing with increased traffic, business, and manufacturing noise. There are known health hazards to humans. How will the project mitigate this impact? How will noise affect the existence of wildlife? Evaluate the effects of noise on nearby conservation and open-space areas, and determine if the conservation values match those necessary for the goals of providing “safe haven” habitat and wildlife corridors.

RECREATION

- See previous comments under the FOREST heading. How will so much recreational use change forest habitats, affect endangered, special status species? Recreation is not limited to project area parks and other facilities.
- There are few regional parks already in the area. What about increased use on Quail Lake—a popular destination for fishermen, and a
- How can the project justify the use of water for golf courses?

TRAFFIC

- Explain how the project will affect traffic patterns if traffic signal lighting is proposed on Highway 138? What is the financial responsibility of the project to contribute to infrastructure costs that its development will cause?
- The Highway 138 alignment through the Quail Lake area is problematic. How does the project propose to solve traffic problems that will result, if the highway is narrowed or its current state maintained?

- This project will cause major increases in traffic on the 138, Interstate 5. The project appears to be automobile oriented, since the expansion of the 138 is based on the project proceeding to buildout.
- Provide details on mitigation to local communities when traffic increases on roads not intended for large amounts of traffic are affected. High traffic volumes on the I-5 and 138 will predictably divert drivers to secondary roads through our small communities.

UTILITIES AND SERVICE SYSTEMS

- Consider relocating water and wastewater treatment systems, substations and the like, outside of SEAs, especially if modifications and expansion is anticipated. Expansions in SEAs or adjacent areas could be seriously impacted. Any project utilities should be placed beyond viewshed areas visible from 138, and Ridge Route Road.

The Three Points-Liebre Mountain Town Council area faces the potential of tremendous negative effects from this project. While we have recommended some mitigations, please do not take this as our approval of this project. Our council has historically been opposed to such massive development and all the effects this will bring to our rural community, since our mission is to preserve the wonderful aspects of our environment. Our enjoyment of the Tejon Ranch in its present state is one reason many of us live here. Its proposed urbanization and subsequent production of sprawl in an almost completely undeveloped area is saddening.

On behalf of our town council,



Susan Zahnter
Vice President

CC: Field Deputy Christine Borzaga, Assistant Deputy Richard Grooms, 5th District Planning Deputy Edel Vizcarra, Supervisor and Mayor Michael D. Antonovich